

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

MARK W. DOBRONSKI,

Plaintiff,

v.

1-800-LAW-FIRM, PLLC

Defendant.

Case No. 24-cv-12512

Hon. Brandy R. McMillion

Magistrate Judge Kimberly G. Altman

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**DEFENDANT 1-800-LAW-FIRM'S MOTION FOR SANCTIONS AGAINST
PLAINTIFF MARK DOBRONSKI FOR FRIVOLOUS LITIGATION AND
ABUSE OF THE JUDICIAL PROCESS**

Defendant 1-800-LAW-FIRM, PLLC ("Defendant"), by and through its undersigned counsel, respectfully moves this Honorable Court for an order imposing sanctions against Plaintiff Mark Dobronski pursuant to Rule 11 of the Federal Rules of Civil Procedure, the Court's inherent authority, and applicable Michigan law. In support of this Motion, Defendant states as follows:

1. Plaintiff Mark Dobronski has a documented history of engaging in vexatious, meritless litigation as a serial litigant, using the court system as a tool for harassment and improper financial gain.

2. Plaintiff has initiated multiple frivolous lawsuits against various defendants, including the instant action against 1-800-LAW-FIRM, with no legitimate legal basis, causing undue burden and expense to Defendant and wasting valuable judicial resources.

3. The claims asserted in Plaintiff's complaint are legally and factually baseless, unsupported by any credible evidence, and appear to be part of a broader pattern of unethical conduct and abuse of process.

4. Plaintiff's conduct violates Rule 11(b), as the claims presented: a. Are not warranted by existing law or a non-frivolous argument for extending, modifying, or reversing existing law; b. Are unsupported by evidence and filed for an improper purpose, including harassment and economic coercion.

5. Plaintiff's repeated misuse of the court system constitutes bad faith litigation and warrants sanctions under the Court's inherent authority to deter future abuse.

6. Sanctions are necessary to protect Defendant from further unwarranted legal expenses and to prevent Plaintiff from continuing to exploit the legal system for illegitimate purposes.

WHEREFORE, Defendant respectfully requests that this Court impose appropriate sanctions against Plaintiff Mark Dobronski, including but not limited to:

- a. Dismissal of the lawsuit with prejudice;
- b. An award of attorneys' fees and costs incurred in defending against this frivolous action;
- c. A pre-filing injunction or other appropriate measures to deter Plaintiff from further abuse of the judicial process;
- d. Any other relief this Court deems just and proper.

Dated: March 10, 2025

Respectfully submitted,

/s/Ari Kresch
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BRIEF IN SUPPORT OF DEFENDANT’S MOTION FOR SANCTIONS

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CONCISE STATEMENT OF THE ISSUES PRESENTED

1. Should the Court Grant Defendant's Motion for Sanctions against Plaintiff in this action pursuant to Rule 11 of the Federal Rules of Civil Procedure, the Court's inherent authority, and applicable Michigan law?

Proposed Answer: Yes.

**CONTROLLING OR MOST APPROPRIATE AUTHORITY FOR THE
RELIEF SOUGHT**

Cases

Feathers v. Chevron U.S.A., Inc., 141 F.3d 264, 269 (6th Cir. 1998)9

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INTRODUCTION

Defendant 1-800-LAW-FIRM, PLLC submits this Brief in support of its Motion for Sanctions against Plaintiff Mark Dobronski, a serial litigant who has engaged in a pattern of filing frivolous lawsuits as a business strategy. Plaintiff's actions constitute an abuse of the court system, warranting sanctions under Federal Rule of Civil Procedure 11, the Court's inherent authority, and Michigan law.

LEGAL STANDARD

Federal Rule of Civil Procedure 11 authorizes sanctions where a party files pleadings that:

1. Lack a proper legal or factual basis;
2. Are filed for an improper purpose, such as harassment or unnecessary delay;
3. Are not warranted by existing law or a non-frivolous argument for legal change.

Additionally, courts possess inherent authority to sanction parties engaging in bad faith litigation. *Roadway Express, Inc. v. Piper*, 447 U.S. 752, 764-65 (1980). Sanctions may include dismissal, fee-shifting, and injunctive relief to curb further abuse.

ARGUMENT

A. Plaintiff Has a History of Filing Frivolous and Abusive Lawsuits

Publicly available records demonstrate that Plaintiff Mark Dobronski has a pattern of filing meritless lawsuits against various entities, using litigation as a means to extract settlements or harass defendants. Courts have repeatedly rejected his claims as legally deficient.

B. Plaintiff's Complaint is Factually and Legally Baseless

In the present case, Plaintiff asserts claims unsupported by evidence or legal precedent. A review of the allegations reveals a lack of merit, and Plaintiff's continued pursuit of these claims amounts to bad faith litigation.

C. Plaintiff's Conduct Warrants Sanctions to Deter Future Abuse

To prevent further misuse of the court system, this Court should impose sanctions, including dismissal with prejudice, attorneys' fees, and a pre-filing injunction requiring Plaintiff to obtain leave before filing any new litigation. Courts have imposed similar sanctions on habitual litigants. See *Feathers v. Chevron U.S.A., Inc.*, 141 F.3d 264, 269 (6th Cir. 1998).

CONCLUSION

For the foregoing reasons, Defendant respectfully requests that this Court impose sanctions against Plaintiff Mark Dobronski, dismiss this lawsuit with prejudice, and grant any additional relief necessary to prevent further abuse of the judicial system.

Dated: March 10, 2025

Respectfully submitted,

/s/Ari Kresch

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NOTICE OF HEARING

Please take notice that Defendant 1-800-LAW-FIRM, PLLC's Motion for Sanctions will be brought before the Honorable Brandy R. McMillion on a date and time determined by the Court.

Respectfully submitted,

Dated: March 10, 2025

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CERTIFICATE OF SERVICE

I hereby certify that on March 10, 2025, I electronically filed the foregoing Motion for Sanctions and Brief in Support with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties and counsel of record and a copy of same has been emailed to Plaintiff at their email address: markdobronski@yahoo.com.

Respectfully submitted,

/s/Eva Skoczylas